

CAMARINOS LAW GROUP, LLC

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Attorneys for Plaintiffs

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

JACQUELINE BORISH SINCLAIR, individually
and in her capacities as ADMINISTRATOR and
ADMINISTRATOR *AD PROSEQUENDUM*
of THE ESTATE OF EDWARD F. SINCLAIR,

Plaintiffs,

v.

TOWNSHIP OF MAHWAH, WILLIAM
LAFORET, individually and in his official
capacity as the Mayor of the Township of
Mahwah, JAMES BATELLI, individually
and in his official capacity as the Chief of Police
of the Township of Mahwah, John Doe 1 and
John Doe 2.

Defendants.

Civil Action No. 16-01568 (MAH)

**NOTICE OF MOTION
FOR LEAVE OF COURT
TO FILE A SECOND
AMENDED COMPLAINT**

TO: Robert Zimmerer, Esq.
Zimmerer, Murray, Conyngham & Kunzier
Park 70 West, Plaza Two
250 Pehle Avenue – Suite 108
Saddle Brook, NJ 07663
Attorneys for Defendant Township of Mahwah

TO: Peter F. Berk, Esq.
Genova Burns LLC
494 Broad Street
Newark, NJ 07102
*Attorneys for Defendant William Laforet,
individually and in his official capacity as the Mayor
of the Township of Mahwah*

TO: Natalia R. Angeli, Esq.
Botta Angeli, LLC
50 South Franklin Turnpike
Ramsey, NJ 07446
*Attorneys for Defendant James Batelli,
individually and in his official capacity as the Chief of Police
of the Township of Mahwah*

PLEASE TAKE NOTICE that on Monday, March 5, 2018 at 9:00 a.m., or as soon thereafter as counsel may be heard, Plaintiffs Jacqueline Borish Sinclair, individually, and in her capacities as Administrator and Administrator *Ad Prosequendum* of The Estate of Edward F. Sinclair (“Plaintiffs”) through their undersigned counsel, Camarinos Law Group, LLC (Michael D. Camarinos, appearing), shall move before The Honorable Michael A. Hammer, United States Magistrate Judge of the United States District Court for the District of New Jersey located at the U.S. Courthouse and Federal Building, 50 Walnut Street, Newark, New Jersey 07102, for entry of an Order granting Plaintiffs leave of Court to amend their pleading and file a Second Amended Complaint.

PLEASE TAKE FURTHER NOTICE that in support of the instant application, Plaintiffs shall rely upon the enclosed Certification of Michael D. Camarinos with exhibits annexed thereto and Brief submitted herewith.

PLEASE TAKE FURTHER NOTICE that this Motion shall be deemed uncontested, and there shall be no right to argue orally unless the Defendants timely file opposition.

PLEASE TAKE FURTHER NOTICE that at the time and place aforesaid, Plaintiffs will request that the Proposed Form of Order submitted herewith be entered by the Court.

Dated: January 30, 2018

Respectfully submitted,

CAMARINOS LAW GROUP, LLC
Attorneys for Plaintiffs

By: /s/Michael D. Camarinos
Michael D. Camarinos, Esq.
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